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May 8, 2024

Via CM/ECF

Hon. Magistrate Judge James R. Cho
U.S. District Court, Eastern District of New York
Courtroom: 11 D South
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Dajlani et al. v. Baby Generation, Inc.*; Case No. 1:23-cv-03394-RER-JRC
Request for Modification to Motion to Dismiss Briefing Schedule

Dear Magistrate Judge Cho:

When the Parties last appeared before the Court on April 1, 2024 for a conference concerning Defendant's motion to dismiss and certain discovery matters, Your Honor ordered, among other things, that: (i) Defendant serve Plaintiffs with its motion to dismiss Plaintiffs' Second Amended Class Action Complaint by April 15, 2024; (ii) Plaintiffs serve their opposition to the motion by May 15, 2024; and (iii) Defendant serve its reply by May 29, 2024. Your Honor further ordered, in accordance with the Individual Practice Rules of Judge Reyes, that upon completion of all briefing on the motion that Defendant file the complete, bundled, motion papers in sequential order on ECF. (Minute Entry, April 1, 2024)

Defendant served Plaintiffs with its motion to dismiss papers on April 15, 2024.

Given various scheduling conflicts and demands, Plaintiffs hereby request a one week extension of until May 22, 2024 to serve Defendant with their opposition to Defendant's motion to dismiss. Defendant would then be granted until June 10, 2024 to serve and file its reply.

This is Plaintiffs' first request for an extension of time to file their opposition to Defendant's motion. Moreover, the granting of this request shall not impact any other scheduled Court deadlines. Finally, we have conferred with Defense Counsel who do not oppose Plaintiffs' request.

Respectfully submitted,

/s/ Joel B. Strauss

Joel B. Strauss
Counsel for Plaintiffs

cc: Defense Counsel (via CM/ECF)